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TO:

Dockets Management Branch (HFA-305), Room 1061

Food and Drug Administration, Rockville Maryland

SUBJECT: Comments on Docket #98N-1038 , "Irradiation in the production, processing and handling of food."

In response to your request for public comments on Docket #98N-1038, following are my recommendations regarding the labeling of foods treated with ionizing radiation. These recommendations are based on the simple premise that the American public should not be relegated to the dietary status of livestock, but instead should be entitled to know what they are eating.

Issue 1) Whether the wording of the current radiation disclosure statement should be revised.

- At the very least, all current requirements for labeling irradiated foods should be continued, including prominent display of the radura symbol.
- The proposed replacement of current labeling with untruthful and misleading euphemisms, such as "cold pasteurization" or "electronic pasteurization", should be rejected—Let's call a spade a spade!
- Issue 2) Whether such labeling requirements should expire at a specified date in the future.
- No, but we should leave open the option of reconsidering the requirements once further research data are available as to the impacts of ionizing radiation on foods and on the people who consume them.

Please keep in mind the principle that frank, complete disclosure of the facts is paramount, for this docket and for all food-related dockets. The food consumer has a need to know the facts as tools to reach his/her own conclusions.

Thank you for your consideration.

Sincerely,
Robert Cohan

Robert Cohen